



ILLINOIS COMMERCE COMMISSION **2020-2021 Winter Preparedness Policy Session**

Illinois Consumers/Ratepayers Advocates' Perspectives

November 18, 2020

THE OFFICE OF THE ATTORNEY GENERAL OF THE STATE OF ILLINOIS

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Today's Agenda

- The Challenges: Energy Insecurity & Energy Burden
- The June 18 Stipulation, Winter Disconnection Moratorium
- A Closer Look: Stipulation Reports Required From Utilities
- Meeting the Challenges: Recommendations





The Challenges: Minimizing Energy Insecurity



- **Energy Insecurity** describes an Illinois consumer's inability to adequately meet basic household heating, cooling, and energy needs. It conjures various equity issues, all of which seek to minimize having residents dangerously under-heat or under-cool their homes or forego other essentials such as rent or mortgage payments, food or medicine.





The Challenges: Reducing High and Severe Energy Burdens



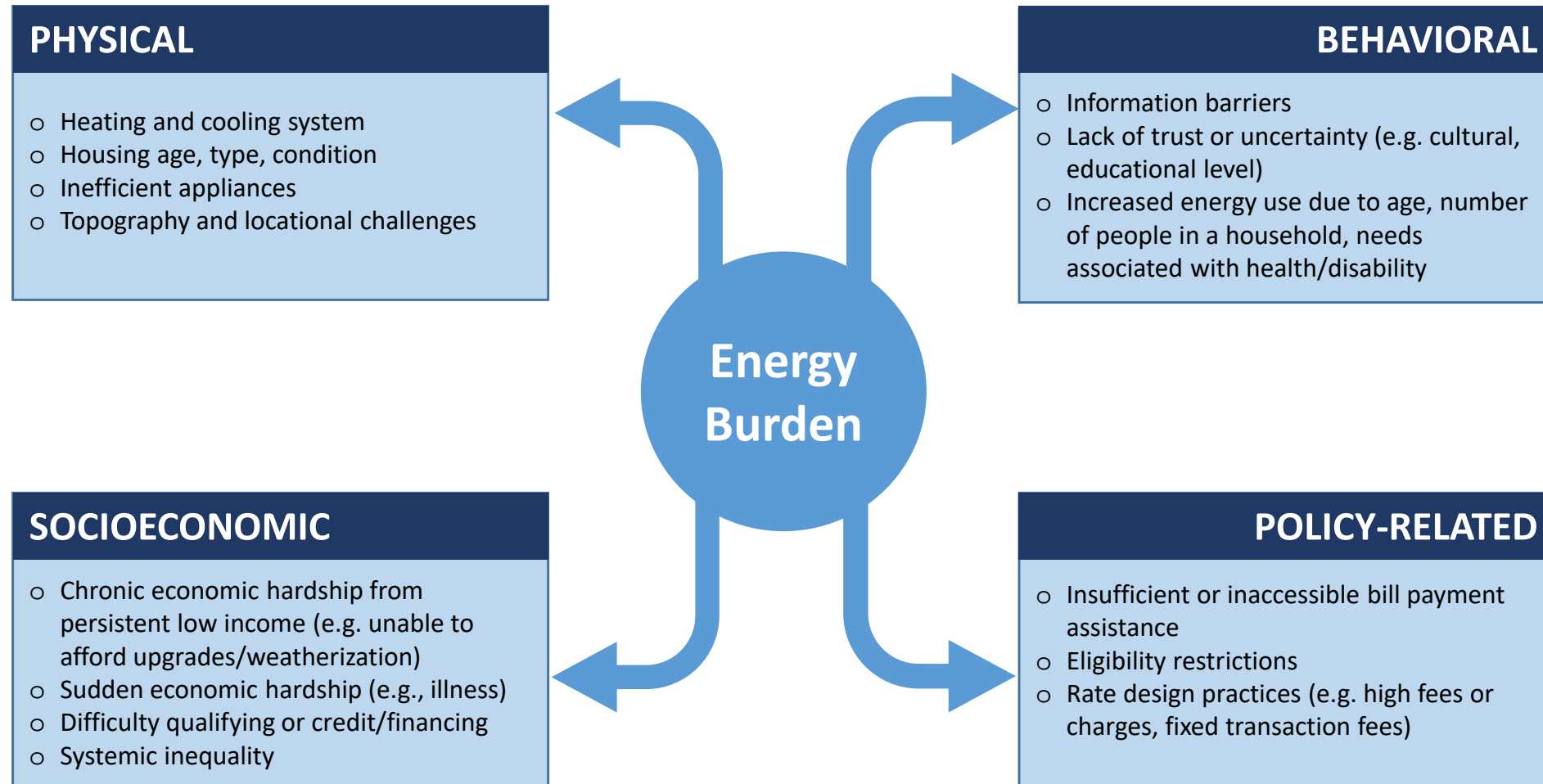
- **Energy Burden** is a metric researchers use to understand what levels of Energy Insecurity consumers are facing. It means the share of household income used to pay annual energy costs.
 - An energy burden greater than six percent ($> 6\%$) is a **high energy burden**.
 - An energy burden greater than 10 percent ($> 10\%$) is a **severe energy burden**.

¹ Ariel Dreihobl, Lauren Ross, & Roxana Ayala. "How High Are Household Energy Burdens? An Assessment of National and Metropolitan Energy Burden Across the United States," American Council for an Energy-Efficient Economy, 11 (September 10, 2020). Available at: <https://www.aceee.org/research-report/u2006> (hereinafter, "AEEE September 2020 Report").

² *Id.* at ii. This definition comes from a widely accepted principle that total shelter costs should not exceed 30 percent of income and that utility costs should not exceed 20 percent of those shelter costs, leading to the conclusion that an affordable energy burden should be at or below six percent of household income ($20\% \times 30\% = 6\%$). See also, U.S. Department of Energy, Energy Efficiency and Renewable Energy Office, "Clean Energy for Low Income Communities Accelerator Fact Sheet," available at <https://betterbuildingssolutioncenter.energy.gov/sites/default/files/attachments/Better%20Buildings%20Clean%20Energy%20for%20Low%20Income%20Communities%20Accelerator%20Factsheet.pdf>.



What key drivers determine a customer's energy burden?



Source: AEEE September 2020 Report, at 4 (Adapted).



Reducing energy burdens is both a State, national challenge

- According to a September 2020 study¹, the Energy Burden for **a median household in the United States is 3.1% of income**.
 - Low-Income households spend **three times more** of their income on energy costs compared to the median spending of non-low-income households (8.1% vs. 2.3%).
 - At 3.6%, the study found that the East North Central region (IL, IN, MI, OH, WI) has the **second highest** Energy Burden in the country, and at 9.1%, the **third-highest** Energy Burden for low-income households (< 200% Fed. Poverty Level or “FPL”)
 - In Chicago, **1 out of 5 households** (or 704,117 of 3.56 million) have a high energy burden (> 6%). Over 50% of these households also are categorized with a severe energy burden (> 10%).

¹ AEEE September 2020 Report, at 11.





92% of low-income IL households have severe energy burdens

- There are 1.435 million Illinois households that struggle at/below 200% of the FPL.
- In 2019, these households had a home energy burden between 6% and 30%.

Illinois: Home Energy Burden (%) for Low-Income Households

Poverty Level (FPL)	No. of Households	Home Energy Burden
Below 50%	294,748	30%
50 - 100 %	344,203	16%
100 - 125%	200,656	11%
125 - 150%	196,143	9%
150 - 185%	279,994	7%
185 - 200%	119,476	6%
Total	1,435,220	

Nearly 640,000, or almost half of such households have a severe energy burden of 30% and 16%

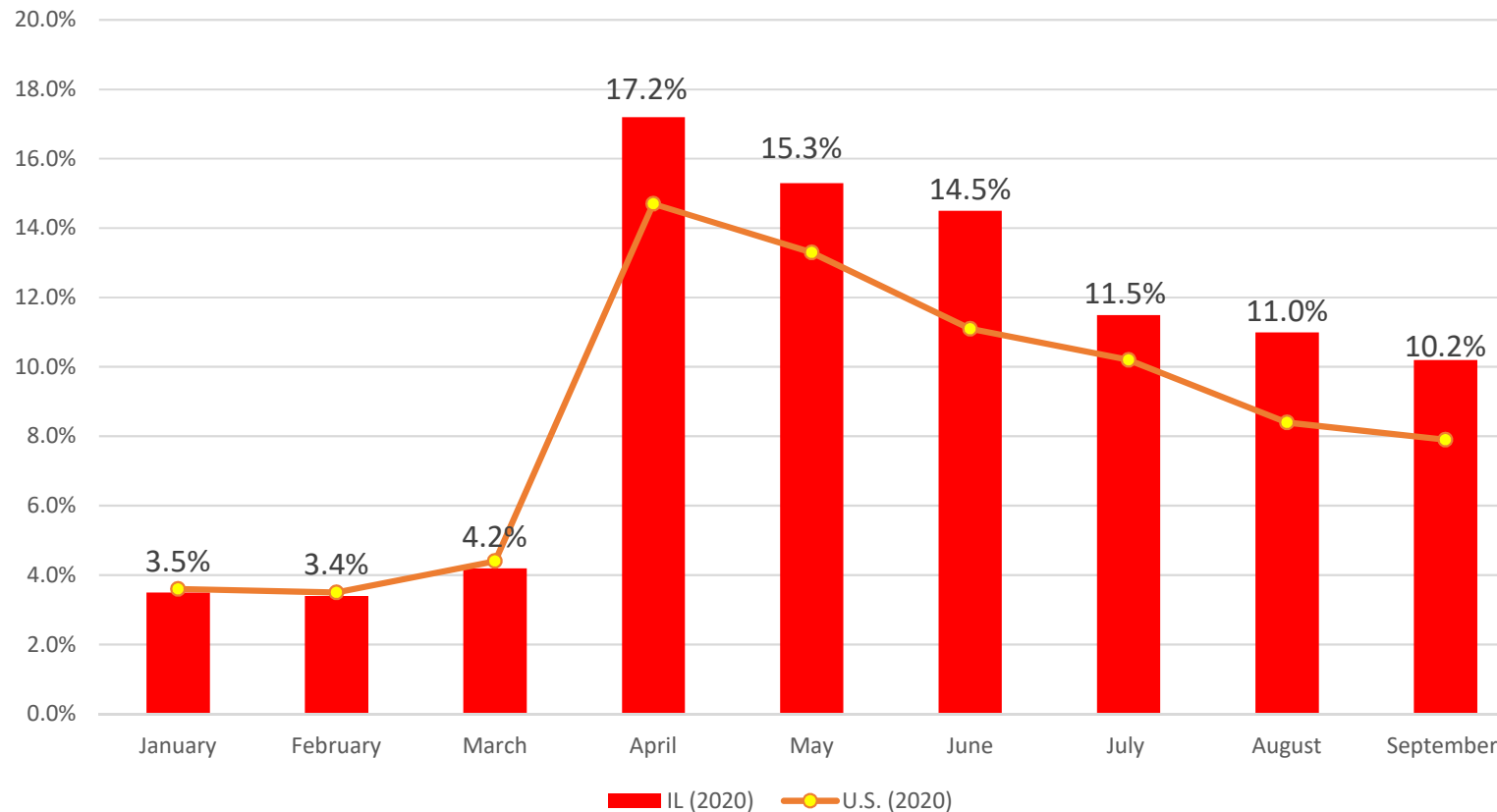
Source: Home Energy Affordability Gap (2nd Series), Published April 2020





Surging infections, high unemployment, will likely exacerbate burdens

Illinois and U.S. Civilian Unemployment Rates
JANUARY 2020 TO SEPTEMBER 2020*



*Seasonably adjusted

Source: Illinois Department of Employment, Security Economic Information and Analysis Division

Illinois Covid-19 Metrics
THROUGH NOV. 13, 2020

Total Cases:
536,542

Total Deaths:
10,846

Positivity Rate
12.8%

Currently
Hospitalized:
5,258

Source: Kaiser Family Foundation



Winter period provides statutory relief from disconnections

- **Health and safety protections bar disconnections:**
 - “On any day when the National Weather Service forecast for the following 24 hours covering the area of the utility in which the residence is located includes a forecast that the temperature will be 32 degrees Fahrenheit or below” (220 ILCS 5/8-205(a)(1)); and
 - “During the period of time from December 1 through and including March 31 of the immediately succeeding calendar year” (220 ILCS 5/8-206(a)).
- **However, the “Winter Disconnection Moratorium” also means:**
 - Consumer’s bills (and arrearages) can escalate with cold/colder temperatures.
 - Payment of high bills can be delayed until non-winter months (April 1).
 - **Flexible, generous, and reasonable** payment plans and assistance programs are essential to ensuring consumers can avoid disconnections between April and November.

¹ Ariel Dreihobl, Lauren Ross, & Roxana Ayala. “How High Are Household Energy Burdens? An Assessment of National and Metropolitan Energy Burden Across the United States,” American Council for an Energy-Efficient Economy, 11, available at: <https://www.aceee.org/research-report/u2006> (hereinafter, “AEEE September 2020 Report”).



Landmark stipulation provides enhanced protections, benefits

- On June 18, 2020,¹ the Commission entered a landmark Stipulation reached between the ICC Staff, Joint Consumer Parties,² and Large/Small Investor-Owned Utilities.³
- The Stipulation provided for **enhanced consumer protections**, including:
 - **Extended repayment plans.** Through December 26, large utility consumers have the right to 18-month Deferred Payment Arrangements (“DPAs”), or 24-month DPAs upon verbally expressing financial hardship (no documentation required). small utility consumers are similarly entitled to DPAs of no less than 8-months.
 - **Extended DPA reinstatement on a first default.** Before August 1, 2021, consumers who default the first time on extended DPAs may reestablish those DPAs under the same terms offered under the Stipulation.
 - **Credit reporting moratorium.** Through December 26, large utilities precluded from reporting late payment or nonpayment for active customers to credit agencies.
 - **New bill payment assistance programs.** Arrearage forgiveness based on eligibility; program benefits vary by utility.

¹ *Illinois Commerce Commission On Its Own Motion*, Docket No. 20-0309, Final Order (June 18, 2020) (In the Matter of Moratorium on Disconnection of Utility Services during the Public Health Emergency Declared on March 9, 2020 pursuant to Sections 4 and 7 of the Illinois Emergency Management Agency Act).

² The Office of the Illinois Attorney General; Citizens Utility Board (“CUB”); City of Chicago; Community Organizing and Family Issues (“COFI”), Legal Aid Society of Metropolitan Family Services, and Allen Cherry.

³ Large Investor-Owned Utilities (“LIOUs”) comprised of Commonwealth Edison Co. (“ComEd”); Ameren Illinois Company (“AIC”); Northern Illinois Gas Company (“Nicor”); North Shore Gas Company (“NSG”); The Peoples Gas Light & Coke Company (“PGL”); Aqua Illinois, Inc. (“Aqua”); Illinois-American Water Company (“IAWC”); and Utility Services of Illinois, Inc. (“USI”). Small IOUs comprised of Consumers Gas Company (“Consumers Gas”); Illinois Gas Company (“IGC”); Liberty Utilities Corp. (“Liberty”); MidAmerican Energy Company (“MEC”); and Mt. Carmel Public Utility Company (“Mt. Carmel”).



Landmark stipulation also requires enhanced utility reporting

- The **Stipulation requires monthly reporting** from large and small utilities.
 - For large utilities, these reports provide data across sixteen distinct (16) metrics, which include the number of customers who are disconnected, receive disconnection notices, are assessed late payment fees or charges, and who enroll in new DPAs.¹ **Utility reports provide each metric by zip code.**
 - Small utilities are similarly required to report metrics such as the number of customers who are disconnected, and who enroll in new DPAs.
- The **Stipulation also requires quarterly reporting** regarding Covid-19 related costs.
- Utilities will continue file monthly reports in ICC Docket Number 20-0309 through **August 31, 2021**, and the quarterly reports through **December 31, 2022**.

¹ *Illinois Commerce Commission On Its Own Motion*, Docket No. 20-0309, Final Order, at Ex. 1 (June 18, 2020) (In the Matter of Moratorium on Disconnection of Utility Services during the Public Health Emergency Declared on March 9, 2020 pursuant to Sections 4 and 7 of the Illinois Emergency Management Agency Act).



Compliance reports: Invaluable tools to address energy burden





Compliance reports: Invaluable tools to address energy burden





We must work together to prevent disconnections

"[D]isconnection of vital utility service for non-payment now and throughout the upcoming fall and winter months poses an untenable burden on the very people we are charged to protect. Disconnection during this unprecedented time will also have a disproportionate impact on the state's most vulnerable citizens: the elderly, persons with medical conditions, and those working and learning remotely."

~ Commission Letter, September 4, 2020



- No Natural Gas means no heat in winter, no hot water for sanitation, no cooking gas
- No Electricity means no light, no appliances, no cooling, no medical devices, no internet, no phone
- No Water means no water for consumption or cooking, no water for sanitation

Utility disconnections can render a home uninhabitable.



Caveats and considerations

- The OAG continues to monitor and develop approaches to analyze available data
 - **Choropleth maps** show statistical snapshot using various shading patterns, which represent variability of a particular metric across a region.
 - **Demographics** of state zip codes include additional socioeconomic insight, and improve understanding of those communities facing high/severe energy burdens and of the impact that credit/collection practices have on those residents. Demographic data here shows the number of individuals in a zip code, not the number of households. **A disconnection of a utility account will impact, on average, 2-3 people.**
- The **Stipulation allowing for extended DPAs expires on December 26, 2020**. This means a residential customer who faces financial hardship after December 26, 2020, and seeks a DPA, will receive a DPA length at the discretion of the utility.
- The data in the compliance reports filed by Ameren and Mid-American do not separate or distinguish between electric and natural gas customers.



Compliance reports: Disconnections

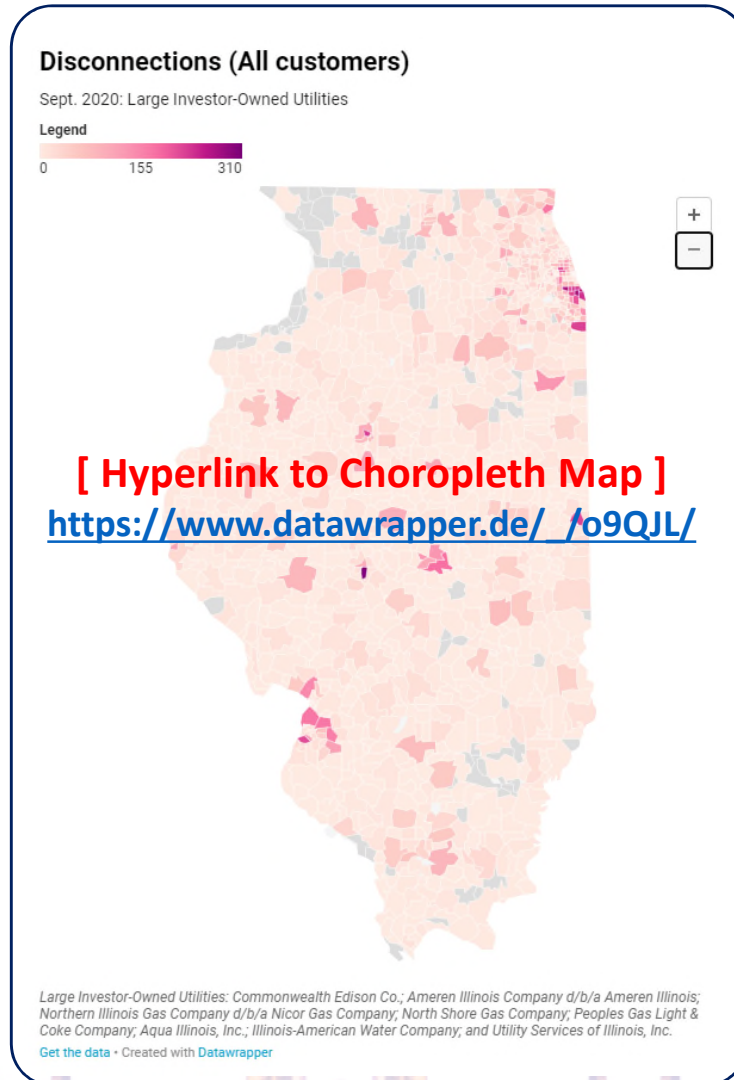
Disconnections: Large Utility, Residential Customers (Sept. - Oct. 2020)

<i>Investor-Owned Utility</i>	SEPTEMBER			OCTOBER		
	<i>Number of Disconnections</i>	<i>% of Low-Income Residential Customers</i>	<i>% of Total Residential Customers</i>	<i>Number of Disconnections</i>	<i>% of Low-Income Residential Customers</i>	<i>% of Total Residential Customers</i>
Commonwealth Edison	9,553	1.59%	0.26%	31,426	3.39%	0.85%
Ameren Illinois	6,543	2.37%	0.56%	14,683	4.57%	1.26%
Nicor Gas	0	0.00%	0.00%	0	0.00%	0.00%
North Shore Gas	0	0.00%	0.00%	169	0.00%	0.11%
Peoples Gas Light & Coke	0	0.00%	0.00%	372	0.00%	0.05%
Aqua Illinois	0	0.00%	0.00%	0	0.00%	0.00%
Illinois-American Water	0	0.00%	0.00%	2,579	N/A	0.77%
Utility Services of Illinois	0	0.00%	0.00%	0	0.00%	0.00%
Totals >>>	16,096			49,229		

- ComEd disconnected 152 (or 0.11%) of its low-income residential customers in September, and 1,066 (or 0.75%) of such customers in October.
- Ameren disconnected 155 (or 0.23%) of its low-income residential customers in September, and 671 (or 0.23%) of such customers in October.



Compliance reports: Disconnections



Disconnections. Among large utilities, only ComEd and Ameren carried out customer disconnections beginning in August. Most disconnections by zip code:

Rank 1-10: Disconnections (All customers)

Sept. 2020, Large Investor-Owned Utilities

Zip Code	Description	(Dis)connections	Pop.*	Dis./Pop.	Race/Ethnicity*	% Poverty*
62703	Southern View, IL (Central IL)	306	30,910	0.99%	White (55.5%); Black (34.6%); Hispanic (4.0%)	31.1%
60619	Chicago, IL (Chatham)	273	61,258	0.45%	Black (95.6%); Hispanic (1.4%); White (1.4%)	25.4%
60629	Chicago, IL (West Lawn)	267	111,850	0.24%	Hispanic (71.0%); Black (19.5%); White (8.2%)	18.3%
60649	Chicago, IL (South Shore)	251	46,024	0.55%	Black (92.6%); White (2.9%); Hispanic (2.6%)	33.5%
60617	Chicago, IL (Calumet Heights)	235	82,534	0.28%	Black (55.4%); Hispanic (37.7%); White (6.3%)	23.3%
60621	Chicago, IL (Englewood)	232	29,042	0.80%	Black (94.3%); Hispanic (3.7%); White (1.1%)	43.5%
60637	Chicago, IL (Parkway Gardens)	227	47,454	0.48%	Black (75.8%); White (14.5%); Asian (4.5%)	36.4%
61614	Chicago, IL (Lincoln Park)	222	28,012	0.79%	White (77.1%); Black (10.1%); Asian (6.8%)	8.7%
60411	Chicago Heights, IL	221	57,800	0.38%	Black (50.1%); Hispanic (26.5%); White (20.5%)	23.7%
60651	Chicago, IL (Humboldt Park)	220	63,218	0.35%	Black (51.2%); Hispanic (42.5%); White (4.1%)	25.7%

*Source: <https://www.illinois-demographics.com>

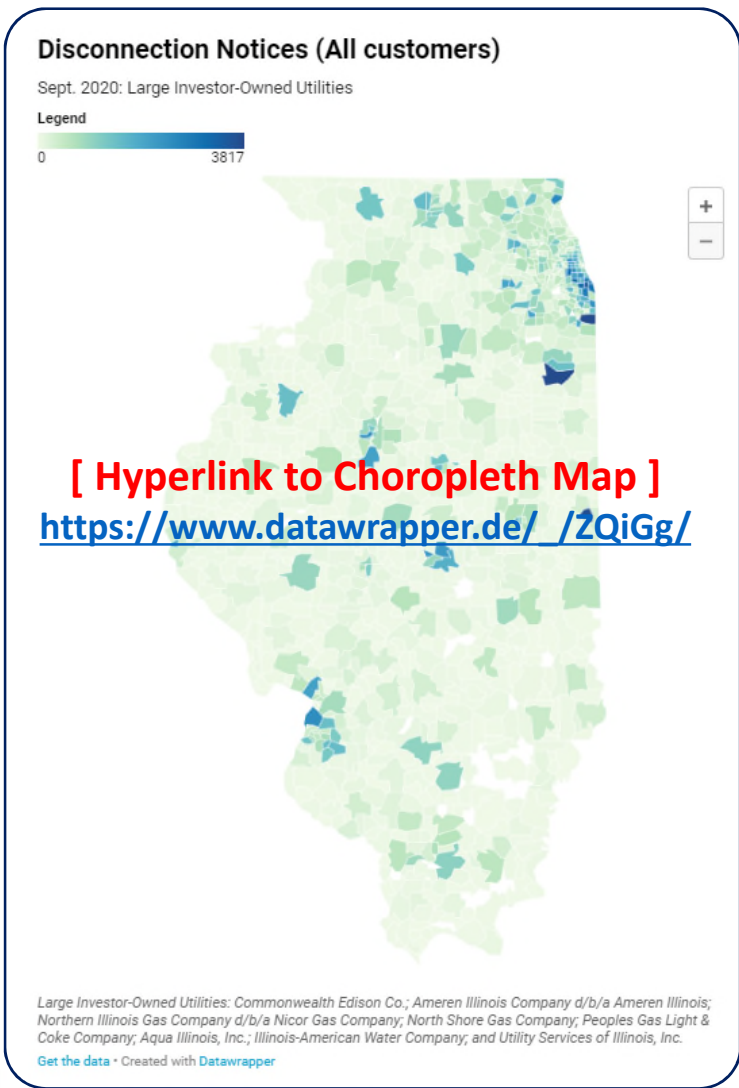


Compliance reports: Invaluable tools to address energy burden





Compliance reports: Disconnection Notices



Disconnections Notices. The top three zip codes with the highest disconnection notices sent are not found in the top 10 for zip codes where disconnection took place.

Rank 1-10: Disconnection Notices (All customers)

Sept. 2020, Large Investor-Owned Utilities

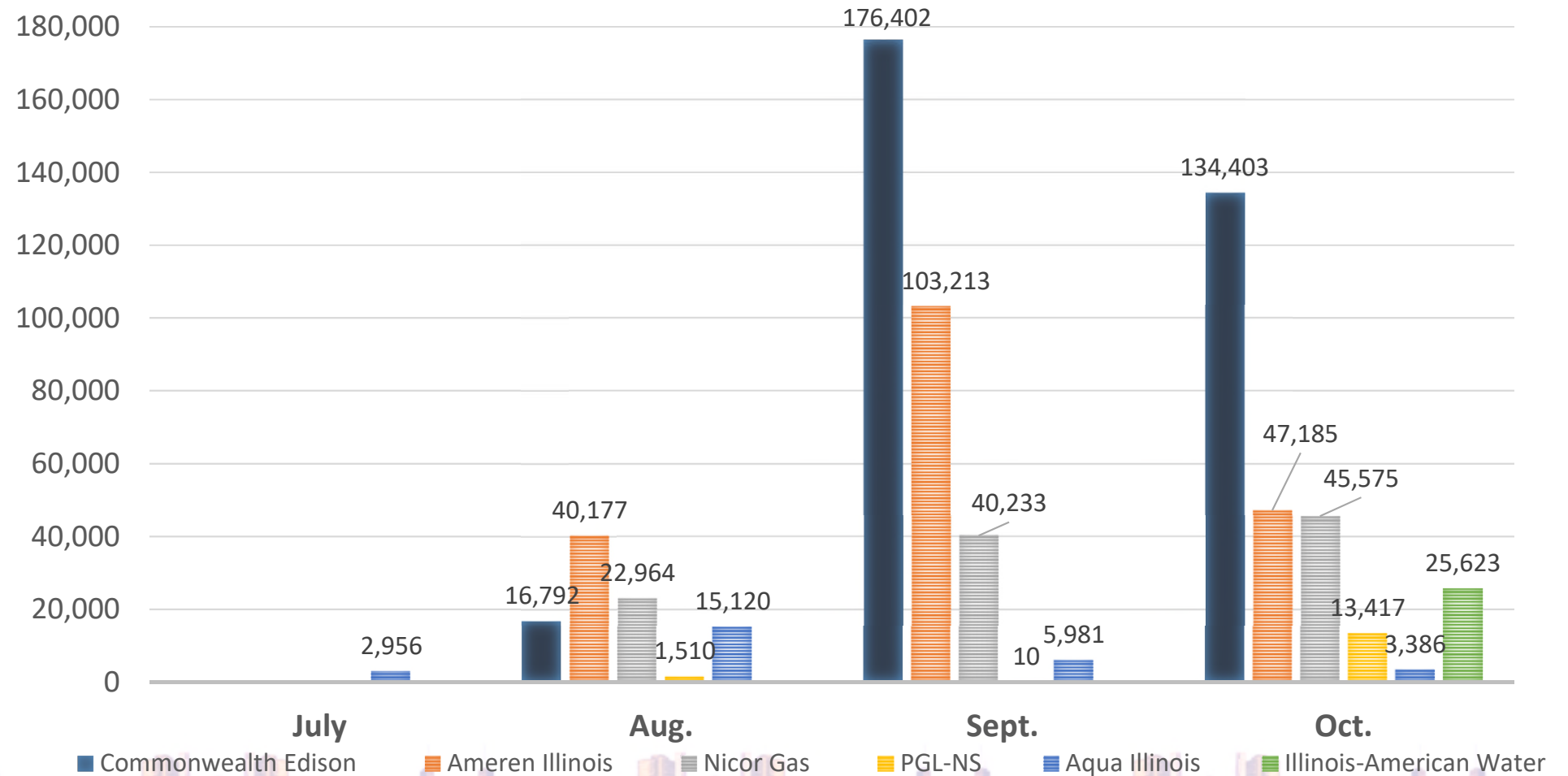
Zip Code	Description	(Dis)connection Notices	Pop.*	Dis./Pop.	Race/Ethnicity*	% Poverty*
60411	Chicago Heights, IL	3,817	57,800	6.60%	Black (50.1%); Hispanic (26.5%); White (20.5%).	23.7%
60901	Kankakee, IL (Northeast)	3,803	35,509	10.71%	White (53.2%); Black (30.8%); Hispanic (13.4%).	23.8%
61832	Danville, IL (Central)	3,728	34,918	10.68%	White (64.5%); Black (26.7%); Hispanic (5.4%).	28.0%
60619	Chicago, IL (Chatham)	3,532	61,258	5.77%	Black (95.6%); Hispanic (1.4%); White (1.4%).	25.4%
60620	Chicago, IL (South Side)	3,234	68,096	4.75%	Black (96.2%); Hispanic (1.3%); White (1.1%).	25.4%
60629	Chicago, IL (West Lawn)	3,225	111,850	2.88%	Hispanic (71.0%); Black (19.5%); White (8.2%).	18.3%
60804	Chicago, IL (Cicero)	3,120	83,147	3.75%	Hispanic (89.2%); White (6.8%); Black (3.1%).	18.2%
60649	Chicago, IL (South Shore)	3,049	46,024	6.62%	Black (92.6%); White (2.9%); Hispanic (2.6%).	33.5%
60637	Chicago, IL (Parkway Gardens)	3,043	47,454	6.41%	Black (75.8%); White (14.5%); Asian (4.5%).	36.4%
60617	Chicago, IL (Calumet Heights)	3,007	82,534	3.64%	Black (55.4%); Hispanic (37.7%); White (6.3%).	23.3%

*Source: <https://www.illinois-demographics.com>



Compliance reports: Disconnection Notices

NUMBER OF DISCONNECTION NOTICES ISSUED
AUGUST – OCTOBER 2020





Compliance reports: Invaluable tools to address energy burden





Compliance reports: Late Payment Fees/Charges

- Sharp increases in the number of large utility residential customers who are being assessed late fees/charges

Number of Accounts Charged Late Payment Fees: Large Utility Residential Customers (July - Oct. 2020)

Investor-Owned Utility	JULY		AUGUST		SEPTEMBER		OCTOBER		TOTAL
	Number of Accounts Charged Late Payments	% of Residential Customers	Number of Accounts Charged Late Payments	% of Residential Customers	Number of Accounts Charged Late Payments	% of Residential Customers	Number of Accounts Charged Late Payments	% of Residential Customers	Number of Late Payments Charged
Commonwealth Edison	0	0.00%	2,579	0.07%	599,696	16.26%	636,499	17.23%	1,238,774
Ameren Illinois	26,934	2.30%	155,244	13.29%	207,210	17.73%	236,469	20.29%	598,923
Nicor Gas	76,480	3.73%	22,964	1.12%	20,117	0.98%	365,555	17.80%	408,636
North Shore Gas	7,338	4.88%	18,777	12.48%	31,162	20.69%	17,567	11.62%	67,506
Peoples Gas Light & Coke	26,381	3.28%	214,931	26.71%	231,374	28.88%	213,235	26.31%	659,540
Aqua Illinois	0	0.00%	0	0.00%	0	0.00%	25,562	34.74%	25,562
Illinois-American Water	0	0.00%	0	0.00%	48,857	14.97%	66,973	19.93%	115,830
Utility Services of Illinois	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0
Totals >>>	137,133		414,495		1,138,416		1,561,860		3,114,771



Compliance reports: Late Payment Fees/Charges

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Totals >>>	137,133		414,495		1,138,416		1,561,860		3,114,771

3.7x

Times increase in number of accounts charged late payment fees by large utilities





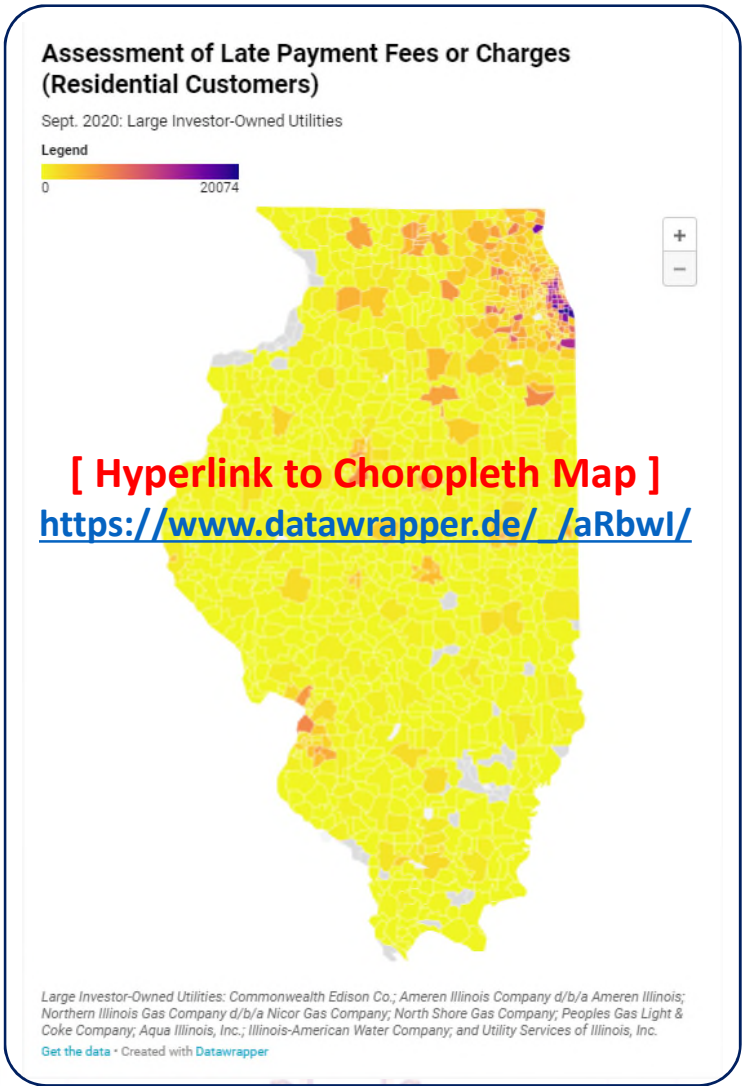
Compliance reports: Late Payment Fees/Charges

<i>Investor-Owned Utility</i>	OCTOBER	
	<i>Number of Accounts Charged Late Payments</i>	<i>% of Residential Customers</i>
<i>Commonwealth Edison</i>	636,499	17.23%
<i>Ameren Illinois</i>	236,469	20.29%
<i>Nicor Gas</i>	365,555	17.80%
<i>North Shore Gas</i>	17,567	11.62%
<i>Peoples Gas Light & Coke</i>	213,235	26.31%
<i>Aqua Illinois</i>	25,562	34.74%
<i>Illinois-American Water</i>	66,973	19.93%
<i>Utility Services of Illinois</i>	0	0.00%
Totals >>>	1,561,860	

- ComEd assessed no late fee/charges to residential customer accounts in July. However, last month, the Company assessed 636,499 late fees/charges to such accounts, which represents **17.23% of all its residential accounts**.
- Ameren assessed 26,934 late fees/charges in July to residential customers (2.3% of such accounts). In October, Ameren assessed 236,469 late fees/charges to residential customers (or **20.29% of such accounts**).
- PGL-NS assessed 33,719 late fees/charges in July to residential customers (3.5% of such accounts). In October, Ameren assessed 230,802 late fees/charges to residential customers (or **24.00% of such accounts**).



Compliance reports: Late Payment Fees/Charges



Late Payment Fees/Charges. Zip codes ranked 7 to 10 do not appear on disconnections or disconnection notices tables.¹

Rank 1-10: 3. Assessment of Late Payment Fees or Charges (Residential customers)
Sept. 2020, Large Investor-Owned Utilities

Zip Code	Description	# Fees, Charges	Pop.*	Dis./Pop.	Race/Ethnicity*	% Poverty*
60619	Chicago, IL (Chatham)	20,074	61,258	32.77%	Black (95.6%); Hispanic (1.4%); White (1.4%).	25.4%
60617	Chicago, IL (Calumet Heights)	19,115	82,534	23.16%	Black (55.4%); Hispanic (37.7%); White (6.3%).	23.3%
60620	Chicago, IL (South Side)	18,793	68,096	27.60%	Black (96.2%); Hispanic (1.3%); White (1.1%).	25.4%
60629	Chicago, IL (West Lawn)	17,888	111,850	15.99%	Hispanic (71.0%); Black (19.5%); White (8.2%).	18.3%
60637	Chicago, IL (Parkway Gardens)	16,790	47,454	35.38%	Black (75.8%); White (14.5%); Asian (4.5%).	36.4%
60649	Chicago, IL (South Shore)	16,478	46,024	35.80%	Black (92.6%); White (2.9%); Hispanic (2.6%).	33.5%
60085	Waukegan, IL	16,122	70,850	22.76%	Hispanic (61.6%); Black (17.1%); White (13.4%).	20.3%
60623	Chicago, IL (Little Village)	15,812	85,979	18.39%	Hispanic (66.1%); Black (30.4%); White (2.9%).	33.4%
60628	Chicago, IL (Roseland)	15,638	66,724	23.44%	Black (93.2%); Hispanic (3.4%); White (1.9%).	26.6%
60618	Chicago, IL (Avondale)	14,499	94,395	15.36%	White (48.3%); Hispanic (40.4%); Asian (6.1%).	11.4%

*Source: <https://www.illinois-demographics.com>

¹ Rank for zip codes from 7-10 are the same for “All customers.” Only ranks changed for 1-10 for “All customers” is reverse of 60637 and 60649, from rank 5 and 6, respectively, to rank 6 and 5.

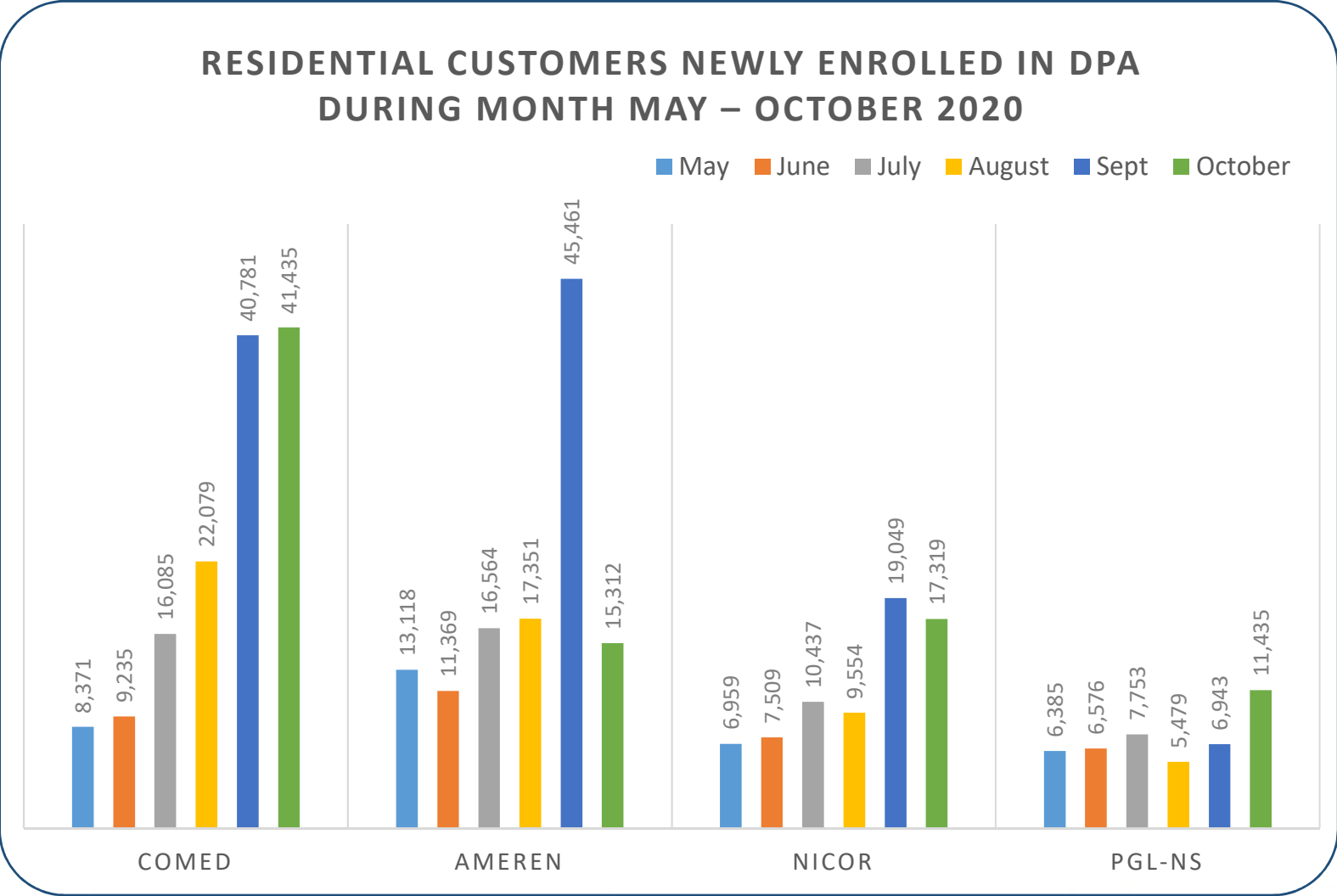


Compliance reports: Invaluable tools to address energy burden





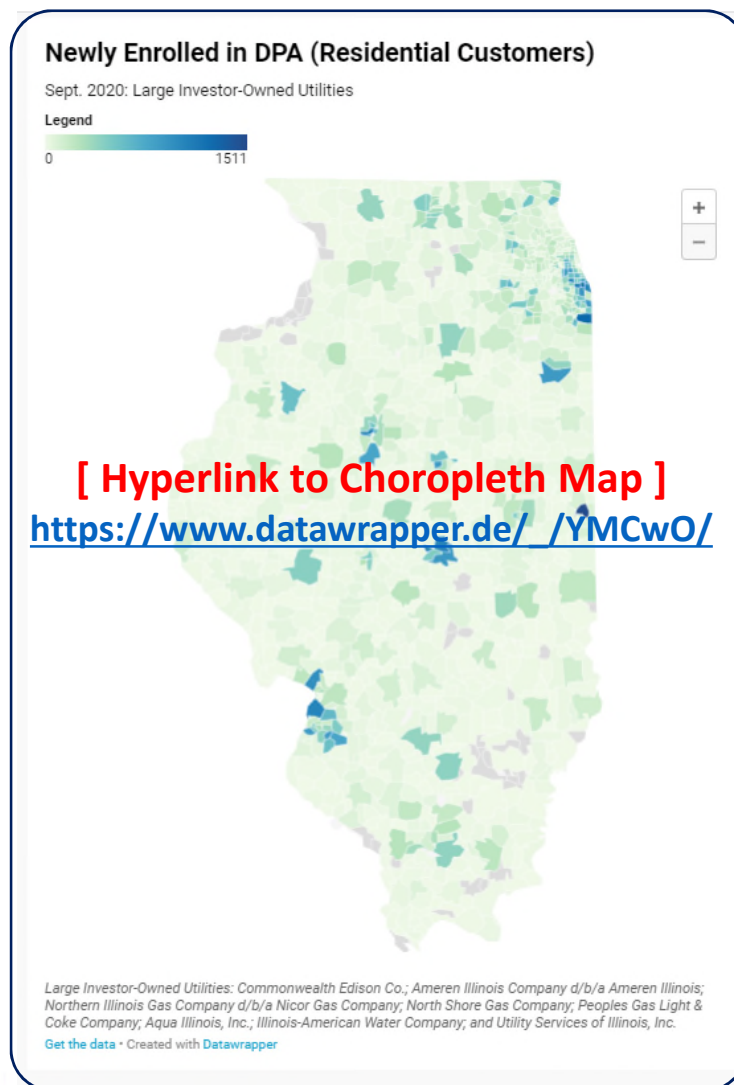
Compliance reports: Customers Newly Enrolled in DPAs



- In **September**, 3,693 ComEd residential customers sought to renegotiate their existing DPAs, along with 2,302 for Ameren, 226 for Nicor, and 138 for PGL-NS.
- In **October**, 3,720 ComEd residential customers sought to renegotiate their existing DPAs, along with 1,765 for Ameren, 188 for Nicor, and 246 for PGL-NS.



Compliance reports: Customers Newly Enrolled in DPAs



Newly Enrolled in DPAs. 6 of the zip codes ranked 1-10 in late payment fees/charges are not included among those with the highest number of customers newly enrolled in DPAs.

Rank 1-10: 3. Newly Enrolled in DPA (Residential customers)

Sept. 2020, Large Investor-Owned Utilities

Zip Code	Description	# Newly Enrolled DPAs	Pop.*	Dis./Pop.	Race/Ethnicity*	% Poverty*
61832	Danville, IL (Central)	1,511	34,918	4.33%	White (64.5%); Black (26.7%); Hispanic (5.4%).	28.0%
60411	Chicago Heights, IL	1,263	57,800	2.19%	Black (50.1%); Hispanic (26.5%); White (20.5%).	23.7%
60619	Chicago, IL (Chatham)	1,174	61,258	1.92%	Black (95.6%); Hispanic (1.4%); White (1.4%).	25.4%
60620	Chicago, IL (South Side)	1,083	68,096	1.59%	Black (96.2%); Hispanic (1.3%); White (1.1%).	25.4%
60617	Chicago, IL (Calumet Heights)	1,051	82,534	1.27%	Black (55.4%); Hispanic (37.7%); White (6.3%).	23.3%
62526	Decatur, IL (Central IL)	1,051	32,303	3.25%	White (72.4%); Black (16.6%).	20.3%
61604	Peoria, IL (~Central IL)	1,044	30,582	3.41%	White (64.3%); Black (25.8%); Hispanic (4.4%).	19.6%
62040	Mitchell, IL (near St. Louis)	1,037	42,447	2.44%	White (84.8%); Hispanic (6.6%); Black (5.9%).	17.9%
60629	Chicago, IL (West Lawn)	1,022	111,850	0.91%	Hispanic (71.0%); Black (19.5%); White (8.2%).	18.3%
62002	Alton, IL (SW IL)	959	31,059	3.09%	White (73.0%); Black (20.1%).	22.9%

*Source: <https://www.illinois-demographics.com>



Quarterly reports: Customer Bill Assistance

	Initial Amount*	Q2	Q3	Total	Funds Remaining
ComEd	\$ 18,000,000.00		\$ 12,466,592.00	\$ 12,466,592.00	\$ 6,230,124.00
			\$ (6,236,468.00)	\$ (6,236,468.00)	
Ameren-Electric	\$ 5,000,000.00		\$ 5,000,000.00	\$ 5,000,000.00	\$ 1,962,908.00
			\$ (3,037,092.00)	\$ (3,037,092.00)	
Ameren-Gas	\$ 3,000,000.00		\$ 3,000,000.00	\$ 3,000,000.00	\$ 1,418,156.00
			\$ (1,581,844.00)	\$ (1,581,844.00)	
Peoples Gas	\$ 12,000,000.00		\$ 7,329,871.00	\$ 7,329,871.00	\$ 7,329,871.00
			\$ -	\$ -	
North Shore Gas	\$ 1,175,000.00		\$ 208,470.00	\$ 208,470.00	\$ 208,470.00
			\$ -	\$ -	
Nicor	\$ 7,500,000.00	\$ 7,500,000.00	\$ -	\$ 7,500,000.00	\$ 4,393,437.00
		\$ -	\$ (3,106,563.00)	\$ (3,106,563.00)	
Aqua	\$ 198,750.00	\$ 200,000.00	\$ -	\$ 200,000.00	\$ 200,000.00
		\$ -	\$ -	\$ -	
IAWC	\$ 668,000.00	\$ -	\$ 668,000.00	\$ 668,000.00	\$ 567,359.00
		\$ -	\$ (100,641.00)	\$ (100,641.00)	
USI	\$ 19,500.00	\$ 20,000.00	\$ -	\$ 20,000.00	\$ 19,852.00
		\$ -	\$ (148.00)	\$ (148.00)	
Liberty	\$ 125,000.00	\$ 125,000.00	\$ 83,274.27	\$ 208,274.27	\$ 166,548.54
		\$ -	\$ (41,725.73)	\$ (41,725.73)	
Mid-Am.-Electricity/Gas**	\$ 275,000.00	\$ -	\$ -	\$ -	\$ 260,690.00
		\$ -	\$ -	\$ -	

*June 18, 2020 Stipulation, Dkt. No. 20-0309

**Electricity: \$100,000; Gas: \$175,000



Opportunities to reduce energy insecurity, energy burdens

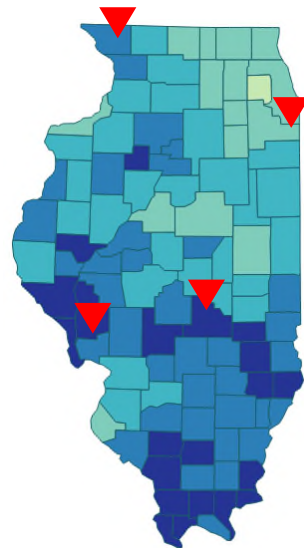


The Commission should exercise its authority to define, establish, and demand utilities, large and small, meet ambitious goals that are critically important to help ensure all Illinois residents “receive essential levels of heat and electric service regardless of economic circumstance.” 305 ILCS 20/2(a)(1).

The OAG identified and made various recommendations in Docket Number 20-NOI-01, *Notice of Inquiry Regarding Energy Affordability*. Several are highlighted on the next two slides.



Takeaways & Recommendations¹

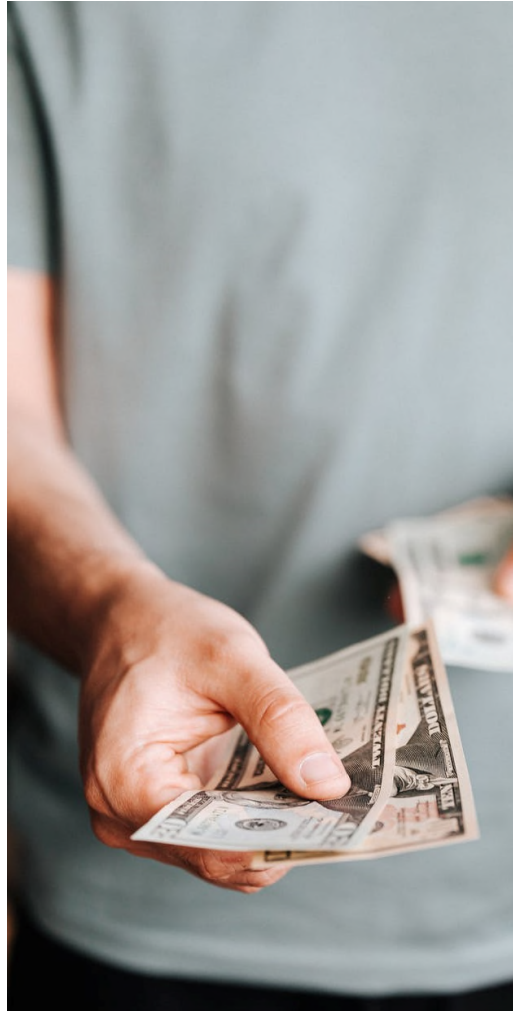


- **Require Enhanced, Standardized Credit and Collections Reporting.** Data enable the Commission to measure the effectiveness of its regulations, and identify those Illinoisans most in need of its assistance. Making the (16) metrics large utilities report in Docket No. 20-0309 a **permanent requirement** would put in place an invaluable tool that the Commission, advocates, and LAAs could use to focus efforts and develop new initiatives.
- **Target Assistance to Address Needs of Vulnerable Members & Communities.** Language and communication barriers could be minimized and overcome by requiring utilities to provide mandatory translation services for any discussion pertaining to credit, collections, assistance, and disconnections. Further, targeting exacerbating transaction fees, such as those utilities charge for paying bills from a bank account, debit or credit card (including those used for government benefits), and revisiting whether/when a struggling customer's balance should be referred to collection, can reduce transaction fees that further burden consumers and do not improve collection from high/severe energy burdened customers.

¹ See Comments of the People of State of Illinois and Reply Comments of the People of the State of Illinois, filed September 30, 2020 and October 30, 2020, respectively, in Docket No. 20-NOI-01, available at <https://www.icc.illinois.gov/notice-of-inquiry/20-noi-01>.



Takeaways & Recommendations¹



- **Enforce Flexible Collection Practices that Accommodates Customer's Energy Burden.** Again, the availability of extended DPAs under the Stipulation will expire on December 26, 2020. Utilities should continue to make these options available for customers. Commission rules for DPAs provide significant flexibility for utilities to accommodate a customer's energy insecurities and energy burdens. Utilities have the discretion to offer longer DPAs that account for a customer's ability to successfully complete it, but pre-Stipulation data show consistently short DPA lengths. 85 Ill. Adm. Code 280.120(g)(1)-(2).
- **Prohibit Disconnections Where Customers Pay an Affordable Amount Toward Bills.** The Commission should define affordability for energy cost at/below 6% of annual household income, with an aim towards the national median energy burden of 3.1% of annual household income, and set a standard of 4% of annual household for water and wastewater affordability.
- **We are in this together.** Illinoisans and companies from all industries are enduring very difficult and challenging times. Utilities need to accept that revenues might be affected.

¹ See Comments of the People of State of Illinois and Reply Comments of the People of the State of Illinois, filed September 30, 2020 and October 30, 2020, respectively, in Docket No. 20-NOI-01, available at <https://www.icc.illinois.gov/notice-of-inquiry/20-noi-01>.



Questions



“The true measure of any society can be found in how it treats its most vulnerable members.”

~ MAHATMA GANDHI



Thank you!



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